

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

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|-----------------------------|---|---------------------------------------|
| SUE ANN LANG |) | |
| |) | |
| Plaintiff, |) | CIVIL ACTION NO. 0:16-cv-2421-MBS-PJG |
| |) | |
| v. |) | |
| |) | |
| |) | |
| SCHAEFFLER GROUP USA, Inc., |) | |
| |) | |
| Defendant. |) | |

ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Response: Plaintiff is unaware of any persons or legal entities that may have a subrogation interest in the claims at issue here.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Response: All of Plaintiff's claims should be tried by a jury. Plaintiff has a right to a jury trial and wishes that her claims to be decided by a jury of her peers.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly- held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent; and (3) each publicly- owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Response: Plaintiff is not a publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

Response: Venue for all causes of action stated herein lies in the District of South Carolina, Rock Hill Division, in that pursuant to 28 U.S.C. § 1391(b), Defendant resides in this District, a substantial part of the events giving rise to these causes of action occurred in this District, and Defendant does business and maintains offices in this District.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Response: To the best of Plaintiff's knowledge, it is not related to any other matter filed in this District.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

Response: Not applicable.

This the 5th day of July 2016.

/s/ Sean F. Herrmann
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